

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA,

v.

20-CR-184-JLS

MELANIE THOMPSON,

Defendant.

INFORMATION

(Title 18, United States Code, Section 2252A(a)(2)(A))

COUNT 1

The United States Attorney Charges That:

Between in or about March 2019, and on or about March 6, 2020, in the Western District of New York, the defendant, **MELANIE THOMPSON**, did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, images of Victim 1, a person known to the United States Attorney, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and 2252A(b)(1).

FOREFEITURE ALLEGATION

The United States Attorney Alleges That:

Upon conviction of the offense alleged in Count 1, the defendant, **MELANIE THOMPSON**, shall forfeit to the United States any visual depiction described in Title 18, United States Code, Section 2252A, or any property which contains any such visual depiction, and any property, real and personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property, including, but not limited to, the following:

- a. One Motorola XT1710-02 Cell Phone, bearing serial number ZY224K326D;
and
- b. One Samsung Galaxy S8+ SM-G955U Cell Phone, bearing electronic serial number 357751082925956.

All pursuant to Title 18, United States Code, Sections 2253(a)(1) and 2253(a)(3).

DATED: Buffalo, New York, February 23, 2021.

JAMES P. KENNEDY, JR.
United States Attorney

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